

1 BILL LOCKYER, Attorney General
of the State of California
2 RAJPAL S. DHILLON, State Bar No. 190583
Deputy Attorney General
3 California Department of Justice
300 So. Spring Street, Suite 1702
4 Los Angeles, CA 90013
Telephone: (213) 897-2568
5 Facsimile: (213) 897-1071

6 Attorneys for Complainant

7 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
8 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

9 In the Matter of the First Amended Accusation Case No. 1D 2002 63089
10 Against:

11 ROBERT B. GRAY II
12421 Central Avenue, Suite A&B
12 Chino, California 91710

**STIPULATED REVOCATION OF
LICENSE AND ORDER**

13 Physical Therapist License Number PT 6117

14 Respondent.
15 _____

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 **PARTIES**


20 1. Steven K. Hartzell (Complainant) is the Executive Officer of the Physical
21 Therapy Board of California. He brought this action solely in his official capacity and is
22 represented in this matter by Bill Lockyer, Attorney General of the State of California, by Rajpal
23 S. Dhillon, Deputy Attorney General.

24 2. Robert B. Gray II (Respondent) is represented in this proceeding by
25 attorney Pamela Ann Thatcher, whose address is 98 East Grand Boulevard, Corona, California
26 92879.

27 3. On or about April 1, 1969, the Physical Therapy Board of California

1 (Board) issued Physical Therapy License Number PT 6117 to Respondent.

2 JURISDICTION

3 4. First Amended Accusation No. 1D 2002 63089 was filed before the Board
4 and is currently pending against Respondent. The First Amended Accusation and all other
5 statutorily required documents were properly served on Respondent on March 18, 2003.
6 Respondent timely filed a Notice of Defense contesting the First Amended Accusation. A copy
7 of First Amended Accusation No. 1D 2002 63089 is attached as exhibit A and  incorporated
8 herein by reference.

9 ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, fully discussed with counsel, and
11 understands the charges and allegations in First Amended Accusation No. 1D 2002 63089.
12 Respondent also has carefully read, fully discussed with counsel, and understands the effects of
13 this Stipulated Revocation of License and Order.

14 6. Respondent is fully aware of his legal rights in this matter, including the
15 right to a hearing on the charges and allegations in the First Amended Accusation; the right to be
16 represented by counsel, at his own expense; the right to confront and cross-examine the
17 witnesses against him; the right to present evidence and to testify on his own behalf; the right to
18 the issuance of subpoenas to compel the attendance of witnesses and the production of
19 documents; the right to reconsideration and court review of an adverse decision; and all other
20 rights accorded by the California Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
22 each and every right set forth above.


23 CULPABILITY

24 8. Respondent admits that his conduct has subjected his physical therapist
25 license to discipline and hereby stipulates to the revocation of his Physical Therapy License
26 Number PT 6117 for the Board's formal acceptance.

27 9. Respondent understands that by signing this stipulation he enables the

1 Board to issue an order accepting the revocation of his physical therapist license without further
2 process.

3 CONTINGENCY

4 10. This stipulation shall be subject to approval by the Physical Therapy
5 Board of California. Respondent understands and agrees that counsel for Complainant and the
6 staff of the Physical Therapy Board of California may communicate directly with the Board
7 regarding this stipulation and settlement, without notice to or participation by Respondent or his
8 counsel. By signing the stipulation, Respondent understands and agrees that he may not
9 withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers
10 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the
11 Stipulated Revocation of License and Order shall be of no force or effect, except for this
12 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall
13 not be disqualified from further action by having considered this matter. 

14 11. The parties understand and agree that facsimile copies of this Stipulated
15 Revocation of License and Order, including facsimile signatures thereto, shall have the same
16 force and effect as the originals.

17 12. In consideration of the foregoing admissions and stipulations, the parties
18 agree that the Board may, without further notice or formal proceeding, issue and enter the
19 following Order:

20 ORDER

21 IT IS HEREBY ORDERED that the stipulated revocation of Physical Therapist
22 License Number PT 6117, issued to Respondent Robert B. Gray II, is accepted by the Physical
23 Therapy Board of California.

24 13. The revocation of Respondent's physical therapist license and the
25 acceptance of the revoked license by the Board shall constitute the imposition of discipline
26 against Respondent. This stipulation constitutes a record of the discipline and shall become a
27 part of Respondent's license history with the Board.

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PAMELA ANN THATCHER
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Revocation of License and Order is hereby respectfully
submitted for consideration by the Physical Therapy Board of California of the Department of
Consumer Affairs.

DATED: 04/16/03_____.

BILL LOCKYER, Attorney General
of the State of California

Original Signed By_____
RAJPAL S. DHILLON
Deputy Attorney General
Attorneys for Complainant



**BEFORE THE
PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the First Amended Accusation
Against:

Case No. 1D 2002 63089

ROBERT B. GRAY II
12421 Central Avenue, Suite A&B
Chino, California 91710

Physical Therapist License Number PT 6117

Respondent.

DECISION AND ORDER

The attached Stipulated Revocation of License and Order is hereby adopted by the Physical Therapy Board of California, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on 06/27/03.

It is so ORDERED 05/29/03.

Original Signed by Ellen Wilson
FOR THE PHYSICAL THERAPY BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS

Exhibit A
First Amended Accusation No. 1D 2002 63089

